

EXHIBIT B

Declaration of Natalie L. Winslow

EXHIBIT B

1 ARIEL E. STERN, ESQ.
Nevada Bar No. 8276
2 NATALIE L. WINSLOW, ESQ.
Nevada Bar No. 12125
3 **AKERMAN LLP**
1635 Village Center Circle, Suite 200
4 Las Vegas, NV 89134
Telephone: (702) 634-5000
5 Facsimile: (702) 380-8572
Email: ariel.stern@akerman.com
6 Email: natalie.winslow@akerman.com

7 *Attorneys for Rushmore Loan Management*
8 *Services, LLC*

9 **UNITED STATES BANKRUPTCY COURT**
10 **DISTRICT OF NEVADA**

11
12 In re:

13 Schulte Properties, LLC,

14
15 Debtor.
16
17
18

Case No.: 18-12734-mkn

Chapter 11

**DECLARATION OF NATALIE L.
WINSLOW IN SUPPORT OF MOTION
FOR ORDER SHORTENING TIME TO
HEAR MOTION TO ENFORCE
SETTLEMENT TERMS**

19 I, Natalie L. Winslow, under penalty of perjury, declare as follows:

20 1. I am a partner at the Akerman LLP law firm. I represent Rushmore Loan
21 Management Services, LLC in this action. I make this declaration in support of Rushmore's motion
22 for order shortening time on Rushmore's motion to enforce settlement terms related to the loans
23 secured by the properties located at 10317 Neopolitan Place, Las Vegas, Nevada and 2861 Marathon
24 Drive, Henderson, Nevada.

25 2. The hearing on the motion to enforce is currently set for September 15, 2021 at 9:30
26 AM.

27 3. An expedited hearing on the motion is needed because there is a strong concern that
28 debtor does not have insurance on the property, pursuant to her obligations under the terms of the

AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572

1 settlement agreements between Rushmore and debtor related to the above-referenced loans. If
 2 insurance is not maintained for the property, Rushmore's collateral for the subject loan is at risk each
 3 day that the insurance is lapsed. *See, e.g. In re Elmira Litho, Inc.*, 174 B.R. 892, 902 n.9 (S.D.N.Y.
 4 1994) (describing failure to maintain property insurance as a "threat" to the property).

5 4. On August 11, 2021, at approximately 3:00 PM, I attempted to speak to debtor's
 6 counsel Matthew Johnson regarding the request for order shortening time on the pending motion. I
 7 called Mr. Johnson's office number but could not reach Mr. Johnson. I was not able to leave a voice
 8 message for Mr. Johnson.

9 5. Following the phone call attempt, I emailed Mr. Johnson at the address listed on his
 10 pleadings, mjohnson@mjohnsonlaw.com. I emailed Mr. Johnson on both August 11, 2021 and
 11 August 12, 2021. Mr. Johnson previously emailed me from this email address on July 7, 2021. My
 12 email communications explained that Rushmore intended to file a motion to enforce the settlement
 13 terms regarding debtor's failure to provide proof of insurance pursuant to the terms of the settlement
 14 agreements. I inquired whether debtor would consent to an order on the motion being heard on
 15 shortened time. As of the filing of this declaration, I have not yet received a response from Mr.
 16 Johnson.

17 6. This request is made in good faith, and not for the purposes of any delay. Rather, this
 18 request is made in an effort to protect the property by confirming appropriate insurance is
 19 maintained for the property.

20 7. I estimate that approximately 10 minutes is needed for a hearing on the motion to
 21 enforce settlement terms.

22 I declare, under penalty of perjury, that the foregoing statements are true and correct to the
 23 best of my knowledge, information, and belief.

24 DATED: August 12, 2021.

25 /s/ Natalie L. Winslow

26 NATALIE L. WINSLOW, ESQ.